

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

FILED

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U.S. BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

Elijah Sumter

Debtor,

Chapter 13

Case No.02-02646 B

MOTION TO SELL PROPERTY

Debtor, by his counsel, hereby moves before this Court for an Order allowing the Debtor to sell property located at 165 Lowman Street and 1596 Amelia Street, Orangeburg, South Carolina. In support of such, Debtors would show this Court the following:

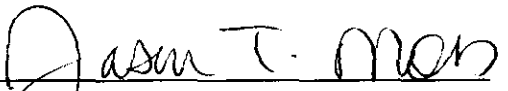
1. Debtors filed a Petition for Relief under Chapter 13 of the Bankruptcy Code on or about March 4, 2002.
2. Debtor is the owner of two properties located at 165 Lowman Street and 1596 Amelia Street, Orangeburg, South Carolina.
3. Citifinancial is the holder of a secured claim against the Debtor, as evidenced by a mortgage on the above-described properties.
4. Debtor wishes to sell these properties to satisfy the both of the mortgages.
5. Debtor believes that it is in the best interests of the creditors for the properties to be sold, as all proceeds will go to the Chapter 13 Trustee.
6. Debtor will use proceeds of sale to satisfy both mortgages. And remaining funds will be issued to the Chapter 13 Trustee to go toward the balance of the Debtors Chapter 13 plan.

WHEREFORE, Debtors move before this Court for an Order allowing Debtors to sell the above-described properties hereinabove.

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Respectfully submitted.

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May 25, 2002